



Matt Blunt, Governor • Doyle Childers, Director

DEPARTMENT OF NATURAL RESOURCES

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JAN 27 2006

Mr. John Mueller
Vice President Quality
Braking Technologies, Inc.
835 Texas Court
O'Fallon, MO 63366

RE: New Source Review Application for a Temporary Permit
Project Number: 2005-11-012, Installation ID Number: 183-0053
Temporary Permit Number: 012006-015
Expiration Date: December 12, 2006

Dear Mr. Mueller:

The Missouri Department of Natural Resources' Air Pollution Control Program has completed a review of your request to temporarily investigate the manufacture of two types of friction material. The Air Pollution Control Program is hereby granting your request to conduct these temporary operations at this location according to Missouri State Rule 10 CSR 10-6.060(3).

Braking Technologies, Incorporated (BTI) currently operates a brake rebuilding and manufacturing operation and wishes to investigate adding an operation in which friction material would be manufactured via a pultrusion process. Two types of friction material will be manufactured: flat material and radius material. The pultrusion process involves drawing reinforced fibers through a liquid resin mixture. The saturated fibers are then pulled through forming guides and into a heated die. The resin chemically reacts in the die creating a solid, hard finished part as the material exits. The part is then cut to the appropriate size. BTI estimates, and this temporary permit requires, that no more than 20 trials of each resin will be conducted to evaluate this process.

Potential emissions of volatile organic compounds (VOCs), phenol and formaldehyde, both hazardous air pollutants (HAPs), are likely from the pultrusion process. For purposes of this review, it is assumed that none of the VOC or HAP contained in the resins is retained in the friction material. No more than 99.24 pounds of resin is required for a run, and as stated previously, no more than 20 runs of each resin are expected. All emissions from the process must be routed through the installation's thermal oxidizer, which offers 90% control of VOCs. Potential emissions during the trials of VOC are 0.08 tons, of phenol are 0.02 tons, and of

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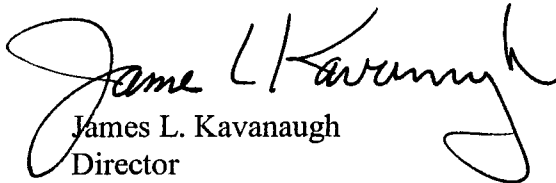
formaldehyde are 0.01 tons. As the potential emissions for the project are well below 100 tons and the ambient air quality standards should not be threatened, the proposed temporary permit should be granted according to provisions of Missouri State Rule 10 CSR 10-6.060(3).

You are still obligated to meet all applicable air pollution control rules, Department of Natural Resources' rules, or any other applicable federal, state, or local agency regulations. Specifically, you should avoid violating 10 CSR 10-5.070, *Open Burning Restrictions*, 10 CSR 10-5.160, *Control of Odors in the Ambient Air*, 10 CSR 10-6.170, *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, and 10 CSR 10-6.220, *Restriction of Emissions of Visible Air Contaminants*.

A copy of this letter should be kept with the unit and be made available to Department of Natural Resources' personnel upon verbal request.

If you have further questions or need additional information regarding this temporary permit, please contact Lina Klein at the Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or you may telephone (573) 751-4817. Thank you for your time and cooperation.

Sincerely,



James L. Kavanaugh
Director

JLK:lkf

c: Mr. Steve Feeler, Compliance/Enforcement Section
St. Louis Regional Office
PAMS File: 2005-11-012